

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: D.I. 283**

**NOTICE OF FILING OF UNREDACTED VERSION OF  
“DECLARATION OF DANIEL NINVAGGI IN SUPPORT OF  
DEBTORS OBJECTION TO FOXCONN’S MOTION” [D.I. 283]**

PLEASE TAKE NOTICE that, on August 21, 2023, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) filed the *Declaration of Daniel Ninivaggi in Support of Debtors’ Objection to Foxconn’s Motion* [D.I. 283] (the “**Ninivaggi Declaration**”) under seal with the United States Bankruptcy Court for the District of Delaware. Please take further notice that, contemporaneously therewith, the Debtors filed the proposed redacted version of the Ninivaggi Declaration. *See* D.I. 284.

PLEASE TAKE FURTHER NOTICE THAT, on August 24, 2023, the Debtors filed the *Debtors’ Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Confidential Information in Connection with the Declaration of Daniel Ninivaggi in Support of Debtors’ Objection to Foxconn’s Motion to Dismiss* [D.I. 321] (the “**Motion to Seal**”). Pursuant to the Motion to Seal, the Debtors requested entry of an order, among other things, authorizing the Debtors to (i) file the Ninivaggi Declaration under seal, and (ii) redact certain confidential

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

information (the “**Confidential Information**”) contained in the Ninivaggi Declaration in the publicly filed version of such declaration.

PLEASE TAKE FURTHER NOTICE that, after filing the Motion to Seal, the Debtors and Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC conferred and agreed that the Confidential Information can be filed publicly on the docket.

PLEASE TAKE FURTHER NOTICE that, on August 28, 2023, the Debtors filed a notice [D.I. 341] withdrawing the Motion to Seal without prejudice.

PLEASE TAKE FURTHER NOTICE that, the unredacted version of the Ninivaggi Declaration is attached hereto as **Exhibit A**.

*[Remainder of page intentionally left blank.]*

Dated: August 28, 2023

Respectfully submitted,

/s/ Jason M. Madron

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